

R E M A R K S

It has been noted with great appreciation that the Examiner has allowed Claim 2 and has found allowable subject matter in Claims 4-5.

Herein, new claim 11 recites the subject matter of claim 4 along with the base claim 1. Therefore, it is respectfully submitted that claim 11 is in condition for allowance.

Claims 1, 3 and 6-8 stand rejected under 35 USC 103(a) as being unpatentable over Ratakonda in view of Altunbasak et al.

In response, it is respectfully submitted that the claims recite features neither taught nor suggested by Ratakonda in view of Altunbasak et al. In particular such features include "splitting each shot into sub-entities, called micro-segments comprising a plurality of temporal sub-entities", as recited respectively in Claims 1 and 6.

In addressing these features in the above rejections, column 6, lines 46-69, of Ratakonda is being relied on. However, in column 6, lines 46-69, Herrera:

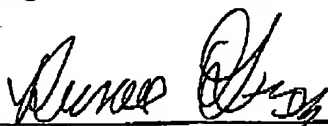
"Locating the actual positions of the keyframes within the shot may be posed as an  $l_1$  minimization problem. Each keyframe represents (and replaces) a contiguous sets of video frames. The union of these contiguous set of video frames is the entire shot. Since each of these contiguous sets of video frames is represented by a single key frame, one would like to ensure that the amount action within one contiguous set of video frames is small."

In view of the above, it is evident that Ratakonda only discloses locating positions of key frames within a shot. Thus, Ratakonda cannot be reasonably interpreted as disclosing "splitting each shot into sub-entities, called micro-segments comprising a plurality of temporal sub-entities", as required by the claims. Therefore, it is respectfully submitted that this feature is distinguishable over Ratakonda in view of Altunbasak et al.

In view of the above-described distinctions, it is respectfully submitted that the invention of Claims 1, 3 and 6-8 is not made obvious by Ratakonda in view of Altunbasak et al. Therefore, it is respectfully requested that this rejection be reconsidered and reversed so that the present application may proceed to issue.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

By   
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